

Karen Lynn Hash
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FILED
JUN 23 2025
U.S. BANKRUPTCY COURT
BY MM DEPUTY

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS / WACO DIVISION**

IN RE:

Terry Mack Hash and Karen Lynn Hash
Debtor(s)

Brenda Keily
Plaintiff

V

Karen Lynn Hash
Defendant

Bankruptcy Case No. 24-60670-mmp Chapter No.7
Adversary No. 25-06001-mmp

**MOTION FOR EXTENSION OF TIME TO OBTAIN LEGAL COUNSEL
AND COMPLY WITH SCHEDULING ORDER**

Karen Lynn Hash ("Movant) , the Defendant in the above captioned adversary proceeding, respectfully request an extension of time to All parties asserting or resisting claims of relief shall serve on all other parties, but not file, the discovery required by Federal Rule of Civil Procedure 26 (a)(1) on or before **6/23/25**.

And states in support of this Motion:

1. The Movant is currently seeking legal counsel to represent her in this adversary proceeding. Due to the complexities of this matter and the

need to find an attorney experienced in **bankruptcy adversary proceedings**, this search has taken longer than anticipated, the initial attempts to secure representation were unsuccessful.

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2. Movant has taken multiple actions to find legal counsel such as contacting numerous attorneys, seeking help from entities such as Legal Aid, Texas State Bar, etc. with no success. Few attorneys in the Western District of Texas do not have expertise in this area or require large retainers, or due to Movant's bankruptcy filing are unwilling to accept the case. *Attached Exhibit A(i) containing list of Attorneys Contacted and list of services contacted.*
 3. An extension is necessary to allow Movant sufficient time to obtain competent legal representation to navigate the legal process and ensure that her rights are properly protected.
 4. The Movant request an extension of 30 Days, **July 23, 2025**.
 5. The Movant asserts that good cause exists for granting this extension because the inability to obtain legal counsel is a reasonable and unavoidable impediment to complying with the current deadlines set forth in the Scheduling Order. The Movant has exercised diligence in seeking representation, and the requested extension is necessary to prevent prejudice to her case.
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WHEREFORE, the Movant request that this court extend the deadline for All parties asserting or resisting claims for relief shall serve on all other parties, but not file, the disclosures required by Federal Rule of Civil Procedure 26 (a)(1) on or before **7/23/25**, and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

June 21, 2025

Karen Lynn Hash

Karen Lynn Hash

**LIST OF ATTORNEYS SERVING WESTERN DISTRICT OF TEXAS
WACO DIVISION. ADVERSARY PROCEEDINGS/BANKRUPTCY**

1. DAVID KOHMS 817-764-1375 MESSAGE /NO RETURN CALL
2. PAKIS LAW 254-379-9720 NOT TAKING NEW CASES
3. ERIN SHANK 254-690-4110 NOT TAKING NEW CASES
4. EVAN SIMPSON 254-399-9977 MESSAGE / NO RETURN CALL
5. LEINART BANKRUPTCY LAW 469-804-5437 DOES NO ADVERSARY
6. LUNDBERG LAW 972-775-3500 CANT DO ADVERSARY NOW
7. ALMAND LAW 817-225-0572 NOT TAKING NEW CASES
8. JD LAW 214-369-6422 CANT HELP
9. NORRED LAW 817-704-3984 \$150 CONSULT APPT. 6/30/25 2:30
10. CHANCE MCGEE CANT HELP
11. JENNIFER WERTZ MESSAGE/NO RETURN CALL
12. CHRIS JAMESON DONT DO ADVERSARY
13. WEYSER KAPLAN 214-552-7242 WANTS 10 TO 20K RETAINER
14. GUY HARVEY HOLMAN CANT HELP
15. TITTLE LAW FIRM 469-956-7944 CANT HELP
16. GARY LYON 214-620-2034
17. DAVID TEKEL 254-776-5095
18. HAYWARD LAW 972-755-7100 WANTS 15K RETAINER PLUS
19. BEARD KUTEGEN 254-776-5500
20. TYLER SIMS 254-304-7161 WONT HELP MY BANKRUPTCY ATTY.
21. FRANK LYON 512-345-8964 WONT RETURN PHONE CALLS
22. DAVID ALFORD 254-297-7300 CANT TAKE CASE
23. ARNOLD & ITKIN 888-493-1629 NEVER RETURNED CALL

LIST OF LEGAL HELP

1. LEGAL HELPLINE 877-969-3412
 2. LEGAL HELPLINE FOR TEXANS 1-800-622-2520 EXT 3
 3. TEXAS STATE BAR
 4. ATTORNEY HOTLINE 817-336-4101
 5. TX LEGAL SERVICES 512-477-6000
 6. VOLUNTEER LEGAL SERVICE OF CENTRAL TEXAS
512-476-5550
 7. TEXAS LAW HELP 800-662-2520 X-3
 8. LEGAL AID NW TX 888-529-5277 OR WAXAHCHIE 972-923-3344
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CERTIFICATE OF SERVICE

I do hereby certify that on June 23, 2025, a copy of the above and foregoing was served by first class mail to the parties listed below or attached hereto:

Thomas G. Kemmy, Kemmy Law Firm P.C. | tomekemmylaw.com
State Bar No. 11254600
1924 N. Main Ave
San Antonio, TX 78212
(210) 750-1019

Tyler Sims, Sims Law PLLC | ecf@simsllawpllc.com
600 Austin Ave, ste 23, Waco, TX 76701
(254) 304-7161

James Studensky | jstudensky.trustee@outlook.com
3912 W. Waco Drive
Waco, Texas 76710
Bankruptcy Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IN RE: §
Terry Mack Hash & Karen Lynn Hash § **CASE NO. 25-6001**
Debtor §

§ **Chapter 7-Adversary**

**Order Granting Motion for Extension of Time to Obtain Legal Counsel and
Comply with Scheduling Order**

On this date came on for consideration the **Motion for Extension of Time to Obtain Legal Counsel and Comply with Scheduling Order** filed by the above-referenced Debtor in this bankruptcy case. Having reviewed the Motion, the Court finds that it should be _____.

IT IS, THEREFORE, ORDERED that the **Motion for Extension of Time to Obtain Legal Counsel and Comply with Scheduling Order** shall be, and hereby is, _____.

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